

September 4, 2019

SNAP Program Design Branch
Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

RE: Notice of Proposed Rule Making — Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584

Dear SNAP Program Design Branch:

On behalf of National PTA and our 3 million PTA members, we appreciate the opportunity to comment on the U.S. Department of Agriculture's (USDA) Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). National PTA is committed to promoting the health and well-being of our nation's children and families. We recognize that children need nutritious meals in order to reach their full potential, and we consistently advocate to ensure low-income and at-risk youth have access to federal school meal programs. The proposed rule would eliminate SNAP benefits for millions of families and jeopardize children's access to free school breakfast and lunch, leading to lasting damage to their health, wellbeing and ability to learn and thrive. We urge USDA to withdraw the proposed rule change.

SNAP plays a critical role in addressing hunger and food insecurity across the nation and serves as a safeguard against hunger for many low-income children and families. To ensure needy households can access SNAP, most states¹ utilize the Broad-Based Categorical Eligibility (BBCE) policy option. BBCE allows states to eliminate SNAP asset tests and use a higher income test to serve working families that have significant expenses for shelter and childcare. The proposed rule eliminates states' ability to use BBCE by limiting the use of modified income and asset tests. The proposed rule's Regulatory Impact Analysis estimates 1.7 million households will lose SNAP benefits as a result and households that remain eligible will face additional burdens associated with the application process. The potential impact as outlined in the Regulatory Impact Analysis puts children in these households at risk for increased hunger, diminishes their access to nutritious foods and threatens their overall wellbeing. It is worth noting that Congress expressed its support for BBCE in the 2018 bipartisan Farm Bill (P.L. 115-334). It is inappropriate for USDA to act in a way that is inconsistent with the will of Congress, diminishing states' abilities to effectively meet the needs of their citizens and increasing hunger in this country.

¹ Congressional Research Service (CRS), based on data from the U.S. Department of Agriculture, as of July 2019.

The proposed rule also fails to recognize the important link between children who live in households that receive SNAP benefits and school meals. Children who live in SNAP households are automatically eligible and directly certified² for free school meals. This ensures that children have access to nutritious breakfasts and lunches during school which help combat childhood hunger³ and improve academic achievement and test scores while reducing absenteeism, tardiness and discipline referrals.⁴ Under the proposed rule, children in households that receive SNAP because of BBCE could lose automatic eligibility for free school meals potentially affecting about half a million children according to unpublished Administration estimates.⁵ The proposed rule's Regulatory Impact Analysis makes no mention of this potential impact on school meal eligibility or of the crucial link between SNAP and school meals. Failing to include the impact on school meal eligibility in the Regulatory Impact Analysis is a massive oversight on the part of USDA and yet another reason why the proposed rule should be withdrawn.

National PTA recognizes that good nutrition is essential to children's health and well-being. Federal nutrition programs such as SNAP, the School Breakfast Program and National School Lunch Program are vital to ensuring that all children receive the healthy meals that allow them to learn and thrive in school and at home. By limiting families' access to SNAP and jeopardizing children's participation in school meal programs, the proposed rule would lead to poor health outcomes and diminished academic results among children and contribute to food insecurity in households across our nation. We urge USDA to withdraw the proposed rule and implement regulations that strengthen nutrition programs while protecting and expanding access to school meal programs. Please contact Eileen Huck, Senior Manager of Government Affairs, at ehuck@pta.org or (703) 518-1225 to answer any questions or provide further input as needed.

Sincerely,



Leslie Carrell Boggs
President
National PTA



Nathan R. Monell, CAE
Executive Director
National PTA

² 7 C.F.R. 245.6

³ *Research Brief: Breakfast for Health*, Food Research & Action Center, <http://frac.org/wp-content/uploads/breakfastforhealth-1.pdf>

⁴ *Research Brief: Breakfast for Learning*, Food Research & Action Center, <https://frac.org/wp-content/uploads/breakfastforlearning-1.pdf>

⁵ Press Statement of Representatives Richard Neal, Bobby Scott, and Collin Peterson, July 23, 2019, <https://neal.house.gov/press-releases/chairmen-neal-scott-and-peterson-oppose-administrations-unilateral-proposal-kick>, and Suzy Khimm, "Trump plan failed to note that it could jeopardize free school lunches for 500,000 children, Democrats say," NBCnews, July 29, 2019, <https://www.nbcnews.com/politics/white-house/trump-plan-failed-note-it-could-jeopardize-free-school-lunches-n1035281>.